

Klein Decl. Exhibit 37

1 UNITED STATES DISTRICT COURT
2 MIDDLE DISTRICT OF NORTH CAROLINA

3 CASE NO. 1:19-CV-593

4
5 ZION WILLIAMSON,

6 Plaintiff,

7 V.

8 PRIME SPORTS MARKETING, LLC, and
9 GINA FORD,

10 Defendants.

11
12 *****

13 VIDEO DEPOSITION OF ZION WILLIAMSON

14
15 The Video Deposition of ZION WILLIAMSON, was
16 taken in the above entitled cause, pursuant to
17 the following stipulation, before Parris A.
18 Amedee, Certified Court Reporter, at The
19 Roosevelt Hotel, 130 Roosevelt Way, The Conti
20 Conference Room, New Orleans, Louisiana on
21 November 11th, 2021 beginning at 9:51 a.m.

22
23 Reported by:

24 PARRIS A. AMEDEE
25 Certified Court Reporter



1 Yeah.

2 THE REPORTER:

3 -- at you.

4 MR. DRUMMOND:

5 Do you want to ask the question?

6 MS. SQUILLACE:

7 No. You might prefer that.

8 MR. DRUMMOND:

9 Mr. Klein's smiling, that's a good
10 thing. That's a good thing. Okay.

11 BY MR. DRUMMOND:

12 Q. Mr. Williamson, sir, have you seen that
13 book before, sir?

14 MR. KLEIN:

15 The question for the moment is
16 "Have you seen this before?" Take a
17 look through it.

18 THE WITNESS:

19 Yeah, that's what I'm doing.

20 MR. KLEIN:

21 Okay.

22 THE WITNESS:

23 I haven't answered the question.
24 I'm just looking through it.

25 BY MR. DRUMMOND:

1 A. No, I haven't seen it.

2 Q. Is it your testimony to us today that
3 just now when I handed that document to you, that
4 book, is the very first time you've seen it?

5 A. Very first time I've seen it.

6 Q. You -- and you've never had any
7 conversation with Ms. Ford regarding this book?

8 A. No.

9 Q. So when we go back to 76, of that which
10 was filed on your behalf in court, that documents
11 were turned over and handed to CAA, is it your
12 testimony here today under oath that, that did
13 not include that book, sir?

14 MR. KLEIN:

15 Objection. He's just told, you
16 he's never seen it before.

17 MR. DRUMMOND:

18 Right.

19 MR. KLEIN:

20 It's an impossible question.

21 MR. DRUMMOND:

22 Okay.

23 MR. KLEIN:

24 Metaphysically --

25 MR. DRUMMOND:

1 Q. Well, do you remember getting a
2 \$100,000.00 in advance from Ms. Ford on/or about
3 April 20th of 2019?

4 A. I don't really remember.

5 Q. Well, do you remember getting any money
6 at all from Prime Sports Marketing as an
7 advancement when you signed with her on April
8 20th of 2019?

9 A. I don't really remember.

10 Q. You don't remember getting that kind of
11 money, Mr. Williams [sic] from Ms. Ford?

12 MR. KLEIN:

13 He just said, "I don't remember."

14 BY MR. DRUMMOND:

15 A. I don't remember.

16 Q. Did -- what about from "Andrew Leutche"
17 from Prime Sports Marketing, do you remember
18 getting \$100,000.00 from him?

19 A. I don't remember.

20 Q. What about your mother or father, do
21 you remember if they receive \$100,000.00 from
22 Prime Sports Marketing?

23 A. I don't know.

24 Q. Okay. Now, did you demand an
25 advancement when you signed with Prime Sports

1 Marketing on April 20th, 2019, in money?

2 MR. KLEIN:

3 Can you read that back to me,
4 please?

5 THE REPORTER:

6 Yes.

7 (A Read Back Was Given.)

8 "Now, did you demand an advancement
9 when you signed with Prime Sports
10 Marketing on April 20th, 2019, in
11 money?"

12 MR. KLEIN:

13 Thank you. You can answer.

14 BY MR. DRUMMOND:

15 A. Not that I'm aware of.

16 Q. Did your mother or father demand an
17 advancement from Prime Sports Marketing when you
18 signed with them in April 20th of 2019?

19 A. Not that I'm aware of.

20 Q. During this May 24th, 2019 time period
21 were you having conversation with Austin Brown at
22 that point, continuing that is?

23 MR. KLEIN:

24 Objection. Asked and answered.

25 BY MR. DRUMMOND: